



Pocono Mountain School District

PO Box 200 • Swiftwater, PA 18370 • 570-839-7121

January 16, 2009

Richard Ponac
Enforcement Officer
U.S. Environmental Protection Agency – Region III
Land and Chemicals Division (3LC62)
1650 Arch Street
Philadelphia, PA. 19103-2029

**Re: Pocono Mountain School District
Notice of Noncompliance and Request to Show Cause
Case Number: A-09-007**

Dear Mr. Ponak,

I am in receipt of the above referenced document entitled "Notice of Noncompliance and Request to Show Cause." One correction that I would like to bring to your attention is the identification of Coolbaugh Elementary Center in your report. The actual building you visited on March 11, 2008 and March 12, 2008 was Coolbaugh Learning Center, located at 194 Main Street, Tobyhanna, PA. This building is referenced in this Notice on page 1, 3, and 4.

In response to Section II (TSCA/AHERA VIOLATIONS) of the Notice of Noncompliance I offer the following information regarding the Pocono Mountain School District's corrective action:

A. Failure to Provide Parent, Teacher and Employee Organization Notification and Related Recordkeeping

Corrective Action: A notification letter was drafted to all Parents, Teachers, and Employees and disseminated on January 15, 2009. The letter will also be published in the Pocono Mountain School District Newsletter.

B. Failure to Conduct Initial Inspections

Corrective Action:

Clear Run Elementary Center – A letter has been received from the Architect stating that to the best of their knowledge no Asbestos Containing Building Material (ACBM) was used during construction.

Coolbaugh Learning Center – The building was inspected by TCI, Environmental Services, Inc. and consequently asbestos containing materials (ACM) were abated by Power Components Systems Inc. under the management of TCI during the months of June/July of 2008. No accessible or visible assumed or confirming ACM remain in the building.

Pocono Mountain East High School – The building was inspected by TCI and no accessible or visible assumed or confirming ACM remain in the building.

Barrett Elementary Center – The building was inspected by TCI and asbestos was identified and is currently being addressed within our management plan.

Pocono Elementary Center – The building was inspected by TCI and no accessible or visible assumed or confirming ACM were identified.

C. Failure to Provide Maintenance and Custodial Staff with Asbestos Awareness Training.

Corrective Action: All custodial and maintenance employees received asbestos awareness training during the months of October and November 2008.

D. Failure to Make Management Plans Available.

Corrective Action: All management plans have been completed and are available in the principal's office at each respective building. A complete set of all management plans are also located at the Central Administration Office.

E. Failure to Train Designated Person.

Corrective Action: Mr. Richard Mikulka, Custodial Supervisor, attended the required Asbestos Hazard Emergency Response Act (AHERA) training on August 7, 2008 and is currently the AHERA designated person for the Pocono Mountain School District.

We believe that the corrective action taken by the Pocono Mountain School District brings us into compliance with the Toxic Substances Control Act (TSCA) and the Asbestos Hazard and Emergency Response Act (AHERA). It is my understanding that a conference call will be held with you, Mr. Richard Mikulka, AHERA Coordinator and me to bring closure to this matter. Please feel free to contact me if you have any additional concerns.

Sincerely,



Stephen Ferraioli
Executive Director, Support Staff Services

Pc: Dr. Dwight R. Pfennig, Superintendent of Schools
Mr. Richard Mikulka, AHERA Coordinator